

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**RECOVERY LIMITED PARTNERSHIP,
Plaintiff,**

v.

Civil Action No.: 2:87-cv-00363

**UNIDENTIFIED, WRECKED AND ABANDONED
SAILING VESSEL, etc.,
Defendant.**

NOTICE OF MOTION TO SEAL

TAKE NOTICE THAT Recovery Limited Partnership (the “Plaintiff” or “RLP”), by counsel, pursuant to the Letter of this Court dated April 2, 2025 (*See* ECF #336), moves this Court for leave to file under seal Exhibits 1 – 3 to the Memorandum in Support of RLP’s Motion to File under Seal. Exhibit 1 is the Plaintiff’s Confidential Status Report. Exhibit 2 is the Declaration of John B. Pidcock. Exhibit 3 is the Declaration of Craig T. Mullen.

This serves as public notice that RLP is moving to file the above document under seal. RLP’s grounds for seeking leave to file the above pleading under seal are set forth in its Motion to Seal and Memorandum in Support. Any party or non-party who opposes or objects to the sealing of this document must file its objection with the Clerk of Court within seven (7) days after the filing of this Motion to Seal. If no objection is filed in a timely manner, the Court may treat the Motion to Seal as uncontested.

This 30th day of May, 2025.

/s/ K. Barrett Luxhoj

James L. Chapman, IV, Esquire (VS. No. 21983)
K. Barrett Luxhoj, Esquire (VS. No. 86302)
Counsel for Recovery Limited Partnership
CRENSHAW, WARE & MARTIN, PLC.
150 West Main Street, Suite 1923
Norfolk, Virginia 23510
Telephone: (757) 623-3000
Facsimile: (757) 623-5735
jchapman@cwm-law.com
kbluxhoj@cwm-law.com

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of May, 2025, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered filers.

/s/ K. Barrett Luxhoj

James L. Chapman, IV, Esquire (VS. No. 21983)

K. Barrett Luxhoj, Esquire (VS. No. 86302)

Counsel for Recovery Limited Partnership

CRENSHAW, WARE & MARTIN, PLC.

150 West Main Street, Suite 1923

Norfolk, Virginia 23510

Telephone: (757) 623-3000

Facsimile: (757) 623-5735

jchapman@cwm-law.com

kbluxhoj@cwm-law.com